

Exhibit C:

Approved, SCAO

Original - Court
1st copy - Plaintiff2nd copy - Defendant
3rd copy - Proof of serviceSTATE OF MICHIGAN
JUDICIAL DISTRICT
45 DISTRICT COURT JUDICIAL CIRCUITANSWER, CIVIL
(PAGE 1 OF 4)CASE NO.
2200061GC
Hon. Michelle FriedmanCourt address
13600 OAK PARK BLVD, OAK PARK, MI 48237Court telephone no.
(248) 691-7440

Plaintiff name(s), address(es), and telephone no(s).

JPMORGAN CHASE BANK N.A.
c/o Attorney

Plaintiff's attorney, bar no., address, and telephone no.

JAMES M MCARDLE (P82443)
PO BOX 109032
Chicago, IL 60610
(833) 769-2757

Defendant name(s), addressees, and telephone no(s).

Katrina Bergunder
24674 Republic Ave
Oak Park, MI 48237
(773) 853-7085

Defendant's attorney, bar no., address, and telephone no.

- ☒ Defendant,
☐ Attorney for defendant in answer to the complaint states:

(Paragraph numbers in the answer must correspond to paragraphs in the complaint. Attach additional sheets if necessary.)

1. I ☐ agree with the statements in paragraph 1.
☐ disagree with the statements in paragraph 1 because
☒ do not know if the statements in paragraph 1 are true.
2. I ☐ agree with the statements in paragraph 2.
☐ disagree with the statements in paragraph 2 because
☒ do not know if the statements in paragraph 2 are true.
3. I ☐ agree with the statements in paragraph 3.
☐ disagree with the statements in paragraph 3 because
☒ do not know if the statements in paragraph 3 are true.
4. I ☐ agree with the statements in paragraph 4.
☒ disagree with the statements in paragraph 4 because I do not have a copy. I kindly request the Plaintiff provide a copy.
☐ do not know if the statements in paragraph 4 are true.
5. I ☐ agree with the statements in paragraph 5.
☐ disagree with the statements in paragraph 5 because
☒ do not know if the statements in paragraph 5 are true.

DISTRICT COURT 45-B
OAK PARK, MICHIGAN
TRUE COPY
DATE 5/16/22
MAY 15 2024

- ☒
- continued on page 2.

Date

05/16/22

Katrina Bergunder
Defendant/Attorney signatureKatrina Bergunder
Name (Type or print)

IMPORTANT: If you have affirmative defenses, you must state them now using the last page of this form. If you do not, the court may prohibit you from raising them later. An affirmative defense is a defense claiming that the plaintiff is not entitled to a judgment because other facts exist that create a lawful defense. Affirmative defenses allow you to provide information to the court that is not stated in the plaintiff's complaint.

CERTIFICATE OF SERVICE

I certify that on this date I served a copy of this answer on the plaintiff(s) or their attorney(s) by

- ☐
- personal service
- ☒
- first-class mail addressed to their last-known address(es) as defined in MCR 2.1 07(C)(3).

MAY 16 2022

Date

Signature

Approved, SCAO
Form MC 03, Rev. 1/21
MCR 2.111
SRL
PAGE 1 OF 445TH DISTRICT COURT
2022 MAY 16 AM 10:37

Approved, SCAO	Original - Court 1st copy - Plaintiff	2nd copy - Defendant 3rd copy - Proof of service
STATE OF MICHIGAN JUDICIAL DISTRICT 6th JUDICIAL CIRCUIT	ANSWER, CIVIL (PAGE 2 OF 4)	CASE NO. 2200061GC Hon. Michelle Friedman
Plaintiff's name(s) JPMORGAN CHASE BANK N.A.	v	Defendant's name(s) Katrina Bergunder

continued from page 1.

6. I ☐ agree with the statements in paragraph 6.
☐ disagree with the statements in paragraph 6 because _____
☒ do not know if the statements in paragraph 6 are true.
7. I ☐ agree with the statements in paragraph 7.
☒ disagree with the statements in paragraph 7 because Fraud is suspected on the account.
☐ do not know if the statements in paragraph 7 are true.
8. I ☐ agree with the statements in paragraph 8.
☐ disagree with the statements in paragraph 8 because _____
☒ do not know if the statements in paragraph 8 are true.

DISTRICT COURT 45-B
OAK PARK, MICHIGAN
TRUE COPY
DATE 1.10.24
MAY 15 2024

45TH DISTRICT COURT
2022 MAY 16 AM 10:37

Approved, SCAO STATE OF MICHIGAN JUDICIAL DISTRICT 6th JUDICIAL CIRCUIT	Original – Court 1st copy – Plaintiff ANSWER, CIVIL (PAGE 3 OF 4)	2nd copy – Defendant 3rd copy – Proof of service CASE NO. 2200061GC Hon. Michelle Friedman
---	--	--

 Plaintiff's name(s)
 JPMORGAN CHASE BANK N.A.

v

 Defendant's name(s)
 Katrina Bergunder

CHECK ALL THAT APPLY (for each box checked, attach a statement of facts)

AFFIRMATIVE DEFENSES
☒ Defendant, ☐ Attorney for defendant states the following affirmative defenses:

- ☐ 1. I paid this debt in full (satisfied). Attached is proof of payment.
- ☐ 2. This action is barred by the statute of limitations because
- ☐ the plaintiff failed to sue within six years of _____ the last activity on the alleged account. MCL 600.5807(8).
- ☐ the alleged contract involves a motor vehicle retail sales installment contract or the sale of other goods, and the plaintiff failed to sue within four years of _____ the last activity on the alleged account. MCL 440.2725(1).
- ☐ the plaintiff failed to sue within three years after the alleged contract of sale of a mobile home on _____. MCL 125.2333.
- ☐ 3. ☐ I paid an amount that the plaintiff accepted as payment in full (accord and satisfaction). Attached is proof of payment.
- ☐ The debt was discharged in bankruptcy. The case number was _____.
- ☒ 4. The contract is void or voidable because
- ☐ I was a minor when the alleged contract was made.
- ☐ I was not mentally competent when the alleged contract was made. Probate case number _____ Attached are my letters of conservatorship/guardianship.
- ☒ there was no valid contract (no meeting of the minds) because See Attached Statement of Facts.
- ☒ 5. The contract was severely unjust or extremely one-sided (unconscionable).
- ☐ 6. I am not liable for the alleged damages because of the plaintiff's contributory negligence.
- ☐ 7. The alleged contract is unenforceable because it is not in writing (statute of frauds).
- ☐ 8. My vehicle was repossessed and later sold in a commercially unreasonable manner. MCL 440.9007(3).
- ☒ 9. The contract should not be enforced because of the plaintiff's improper conduct (fraud and/or duress).
- ☐ 10. The goods purchased were defective (failure of consideration).
- ☒ 11. The terms of the contract did not express what the parties intended (mutual mistake).
- ☐ 12. I have not been credited for all payments made on the alleged account. Attached is proof of payment.
- ☒ 13. Other: See Attached Statement of Facts.

Date

05/16/22

Defendant/Attorney signature

 Katrina Bergunder
 Name (Type or print)

 DISTRICT COURT
 OAK PARK, MICH
 TRUE COPY
 DATE 5.16.22
 MAY 15 2024

 45TH DISTRICT COURT
 2022 MAY 16 10:37

Approved, SCAO STATE OF MICHIGAN JUDICIAL DISTRICT 6th JUDICIAL CIRCUIT	Original – Court 1st copy – Plaintiff ANSWER, CIVIL (PAGE 4 OF 4)	2nd copy - Defendant 3rd copy – Proof of service CASE NO. 2200061GC Hon. Michelle Friedman
Plaintiff's name(s) JPMORGAN CHASE BANK N.A.	v	Defendant's name(s) Katrina Bergunder
STATEMENT OF FACTS		

4c. I thought that Plaintiff would be reasonable in repayment in the event of dramatic, devastating, and unforeseen world events such as the global pandemic of COVID-19 that resulted in the world shutting down, loss of work, and the death of millions

5. At the time I was living in poverty, in an abusive situation, and struggling in college, I agreed to the unfair terms to support myself in times when my \$10/hour job could not.

9. When inquired, they insisted that if I had hardships that they would work with me. Despite my numerous repeated calls, Plaintiff was unwilling to work with me.

11. As part of the world, I thought that Plaintiff would know about large, unforeseen world events and be reasonable in the event of them.

13. While Plaintiff has continuously refused to negotiate, I am still willing to negotiate with Plaintiff to resolve our issues.

DISTRICT COURT 45-B
 OAK PARK, MICHIGAN
 TRUE COPY
 DATE MAY 15 2024

45TH DISTRICT COURT
 2022 MAY 16 AM 10:37